

BAKER & MCKENZIE LLP

Paul C. Evans

452 Fifth Avenue

New York, NY 10018

Direct: +1 212.626.4336

Fax: +1 212.310.1600

*Attorneys for Defendant Google LLC*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

R.J.,

Plaintiff,

vs.

FACEBOOK INC.; INSTAGRAM;  
MARK ZUCKERBERG; GOOGLE;  
GOLDEN NUGGET CASINO;  
SCIENTIFIC GAMES (a.k.a. SG  
DIGITAL); EZUGI GAMING; MGM  
CASINO a.k.a. BET MGM; CASINO  
PARTY; BORGATA CASINO;  
BORGATA HOTEL CASINO & SPA;  
BET AMERICA CASINO; DRAFT  
KINGS CASINO; STATE OF NEW  
JERSEY; “JOHN DOES 1-10” and  
“ABC COMPANIES 1-10” (both being  
fictitious designations),

Defendants.

Case No. 2:20-cv-17136-JMV-JBC

Honorable John Michael Vazquez

**Oral Argument Requested**

**Motion Date: May 3, 2021**

**DEFENDANT GOOGLE LLC’S NOTICE OF MOTION AND MOTION TO  
DISMISS PLAINTIFF’S COMPLAINT PURSUANT TO  
FED. R. CIV. P. 12(b)(6)**

TO: Rami Jaloudi  
78 W. Hudson Avenue, Apt. C1  
Englewood, New Jersey 07631  
*Pro Se Plaintiff*

Mark S. Pincus  
PINCUS LAW LLC  
90 Broad Street, 23rd Floor  
New York, New York 10004  
*Attorneys for Defendants Facebook Inc., Instagram, and Mark  
Zuckerberg*

Russell Marc Yankwitt  
YANKWITT LLP  
140 Grand Street, Suite 705  
White Plains, New York 10601  
*Attorneys for Defendant Golden Nugget Casino*

Karen A. Confoy  
Melanie E. Getz  
FOX ROTHSCHILD LLP, PC  
997 Lenox Drive, Building 3  
Lawrenceville, New Jersey 08648  
*Attorneys for Defendants Scientific Games aka SG Digital, Borgata  
Casino, Borgata Hotel Casino & Spa*

**PLEASE TAKE NOTICE** that on May 3, 2021, or as soon thereafter as the matter may be heard, Defendant Google LLC (“Google”), by and through its attorneys, Baker & McKenzie LLP, will move before the Honorable John Michael Vazquez of the United States District Court, District of New Jersey, in Courtroom PO 03 of the Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Room 4015, Newark, New Jersey 07101, for an order dismissing all claims

asserted against Google in Plaintiff's Complaint without leave to amend, pursuant to Federal Rule of Civil Procedure 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that, in support of its motion, Google relies on the concurrently filed Memorandum of Points and Authorities, the Request for Judicial Notice, the Declaration of Paul C. Evans, upon all pleadings and proceedings on file in this action, and, if permitted by the Court, oral argument of the parties.

**PLEASE TAKE FURTHER NOTICE** that Google has submitted a Proposed Order.

Dated: January 29, 2021

**BAKER & MCKENZIE LLP**

By: /s/ Paul C. Evans

Paul C. Evans  
Baker & McKenzie LLP  
452 Fifth Avenue  
New York, NY 10018  
United States  
Direct: +1 212.626.4336  
Fax: +1 212.310.1600  
[paul.evans@bakermckenzie.com](mailto:paul.evans@bakermckenzie.com)

*Attorneys for Defendant Google LLC*

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on January 29, 2021, the foregoing document was electronically filed and served with the Clerk of the Court using the CM/ECF system which sends notification of the aforementioned filing to all counsel of record who are registered CM/ECF users.

The undersigned, an attorney, also certifies that on January 29, 2021, I instructed a member of my office to mail the forgoing document via regular mail, postage prepaid and via Federal Express, to all parties who are not CM/ECF users, addressed as follows:

Rami Jaloudi  
78 W Hudson Ave, Apt. C1  
Englewood, NJ 07631

/s/ Paul C. Evans  
\_\_\_\_\_  
Paul C. Evans